No. 03-20-00129-CV

IN THE THIRD COURT OF APPEALS
AUSTIN, TEXAS

QATAR FOUNDATION FOR EDUCATION, SCIENCE AND COMMUNITY DEVELOPMENT,

Appellant,

v.

KEN PAXTON, TEXAS ATTORNEY GENERAL, AND ZACHOR LEGAL INSTITUTE

Appellees.

On Appeal from the 200th Judicial District Court of Travis County, Texas
Trial Court Cause No. D-1-GN-18-006240

APPELLEE'S MOTION FOR LEAVE TO FILE SUR–REPLY

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TO THE HONORABLE THIRD COURT OF APPEALS

Appellee Zachor Legal Institute requests by this motion leave to file the Sur–Reply appended to the motion. *See* Appx. A. As grounds for this request, Zachor shows the following:

1. Appellant Qatar Foundation filed its Reply Brief of Appellant on November 19, 2020, and asserted a new ground in opposition to the trial court's judgment- that it did not have subject-matter jurisdiction to decide the case. The new assertion is that Zachor does not have the prerogative to and is prohibited from asserting that subject–matter jurisdiction was lacking in the trial court based on the absence of a waiver of sovereign immunity for Qatar to sue the Texas Attorney General.

2. Qatar has not asserted this ground previously in the trial court or in its opening Appellant's brief. Qatar purported to support the new ground by reliance on several appellate opinions, which it also had not previously cited.

3. This issue is of critical importance to the jurisprudential of an aspect of the Texas Public Information Act when private entities like Qatar contend that public information should remain secret, and they purport to sue the sovereign to prevent release of that information without the consent of the State to do so.

4. Zachor's Appellee's brief included 10,830 words, and the appended Sur-Reply includes 2,004 words. Together Zachor's briefing is well under the 27,000-word limit for total briefing in the courts of appeals. TEX. R. APP. P. 9.4(i)(2)(B).

5. The Sur-Reply provides the rationale supported by additional binding and persuasive authorities that will assist the Court in its analysis of Qatar's position. Zachor believes the Sur-Reply rebuts Qatar's new contention and correctly confirms the obligation all Texas courts have to assure they have subject-matter jurisdiction before proceeding to decide any dispute on the merits.

PRAYER

For these reasons, Appellee Zachor Legal Institute prays that the Court grant its motion for leave to file the appended Sur–Reply and for such further relief to which it justly may be entitled.

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I certify that I communicated with counsel for Qatar Foundation who advised that the Qatar Foundation does not oppose this motion for leave to file a sur-reply.

/s/ Dale Wainwright
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APPENDIX A

No. 03-20-00129-CV

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Because the trial court heard this case on cross motions for summary judgment, there was no evidentiary Reporter's Record.

INTRODUCTION

Zachor filed a motion for leave to file this Sur-Reply to address a fundamental error concerning subject matter jurisdiction in Qatar's Reply. Other issues raised in the Reply have been addressed in Zachor's Response and will not be addressed again in this Sur-Reply.

SUMMARY OF ARGUMENT

Qatar asserts in its Reply that only a governmental unit in Texas may properly raise in the trial court the absence of subject-matter jurisdiction based on sovereign or governmental immunity.[1] Thus, Qatar erroneously contends that because Zachor is not a governmental entity, it was "prohibited" from bringing to the trial court's attention the absence of subject-matter jurisdiction over Qatar's lawsuit. Qatar's position is in error because it overlooks mandates of the Texas Supreme Court requiring determination of a court's power to adjudicate a dispute "in every case" and the appellate opinion (*Smith v. Davis*) on which it primarily relies for this argument had previously been rejected by this Honorable Court and has been rejected by other courts.

[1] Neither the Attorney General nor the Qatar Foundation questioned, in the trial court, Zachor's prerogative to file a plea to the jurisdiction.

ARGUMENT

A Trial Court Must Always Determine Whether It Has Subject-Matter Jurisdiction Over A Dispute Before It Exercises Power Over Proceedings, Whether Raised By A Governmental Unit Or A Private Entity.

Qatar's contention that, even though raised by Zachor, the trial court could not consider its own subject-matter jurisdiction is in error. Qatar's position is even more ironic as it asserts that *Zachor's raising of sovereign immunity is the reason* the trial court was precluded from considering its lack of power to adjudicate Qatar's lawsuit.

A. Well-established Texas jurisprudence mandates that courts determine they have the power to adjudicate a dispute before allowing it to proceed.

The well-established law refutes Qatar's contention.

> [A] court is *obliged* to ascertain that subject matter jurisdiction exists regardless of whether the parties have questioned it.

Univ. of Tex. Sw. Med. Ctr. at Dallas v. Loutzenhiser, 140 S.W.3d 351, 358 (Tex. 2004) (abrogated in part by statute) (emphasis in original). "[I]immunity from suit implicates subject-matter jurisdiction, as the Court states, and thus 'involves a court's power to hear a case', *which must be ascertained by every court in every case*." *Rusk State Hosp. v. Black*, 392 S.W.3d 88, 91, 102 (Tex. 2012) (Hecht, J. concurring) (emphasis added). Trial courts have an affirmative duty to determine, *sua sponte*, whether they

have subject-matter jurisdiction to decide a dispute; and the issue "may not be waived by the parties." *See Texas Ass'n of Business (TAB) v. Texas Air Control Board*, 852 S.W.2d 440, 445 (Tex. 1993) (addressing standing which is a component of subject-matter jurisdiction).[2] Indeed, appellate courts have "a duty to consider a question of subject matter jurisdiction sua sponte because the district court's power to decide the merits, as well as our own, rests upon it." *Combs v. Texas Civil Rights* Project, 410 S.W.3d 529 (Tex.App.—Austin, 2013, pet. denied) (Goodwin, J. concurring) (*citing Good Shepherd Med. Ctr., Inc. v. State of Texas,* 306 S.W.3d 825, 837 (Tex.App.—Austin 2010, no pet.)). Texas law requires trial courts to determine, as raised by Zachor here, whether the absence of a waiver of sovereign immunity precludes them from having jurisdiction to adjudicate disputes.

B. Qatar cites authorities that have been discredited and do not address the question at issue.

Contrary to directives from the Supreme Court and this Court, Qatar plants its flag squarely on the case of *Smith v. Davis* and relies on its holding: "[S]overeign immunity is incident to the power and the right to govern and may only be invoked by a governmental unit of the State." 999 S.W.2d 409, 416 (Tex.App.—Dallas 1999, no pet.). *Davis* concluded that a deputy sheriff,

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[2] *See Waco Indep. Sch. Dist. v. Gibson,* 22 S.W.3d 849, 854 (Tex. 2000) (Hecht, J. dissenting) ("We raised the issue of standing *sua sponte* in *TAB* following trial on the merits and a final judgment.") (emphasis added).

sued in his official capacity, could not raise governmental immunity as a defense to suit against him because the county that employed him was not named as a party in the lawsuit to raise immunity. The Court in *Davis* refused to enforce immunity even though it recognized that a suit against a governmental employee in his official capacity is, in substance, a suit against the government; and if liability were found, the governmental unit would be liable—not the deputy sheriff. *Id.* at 416.

This Court, and others cited below, have directly repudiated the holding in *Smith v. Davis* and Qatar's contention that only the governmental entity can raise sovereign immunity in the trial court. *See Liberty Mut. Ins. Co. v. Sharp*, 874 S.W.2d 736, 738 (Tex.App.—Austin 1994, writ denied).

1) In ***Liberty Mut. Ins. Co. v. Sharp***, this Court held that Liberty Mutual's suit against John Sharp, in his official capacity as Comptroller, and James Lynaugh, in his official capacity as Executive Director of the Texas Department of Criminal Justice, was a suit against the state, and "cannot be maintained without legislative consent." *Id.*, 874 S.W.2d at 738. The Court then squarely affirmed that a governmental employee sued in his official capacity may validly raise

immunity to rebut jurisdiction over the adversary's lawsuit.

This Court further held:

> If at any time during its progress it becomes apparent that the court has no authority under the law to adjudicate the issues presented, *it becomes the duty of the court to dismiss it*. *Snyder v. Wiley & Porter*, 59 Tex. 448, 449 (1883); *Galley v. Hedrick*, 127 S.W.2d 978, 981 (Tex.Civ.App.—Amarillo, 1939, no writ).

Id., at 739 (emphasis added) cited with approval by *Brown v. Texas State Board of Nurse Examiners*, at *5 WL 3034321, Oct. 18, 2007 (Austin).

2) The Amarillo Court of Appeals also expressly disagreed with *Davis in* ***McCartney v. May****,* 50 S.W.3d 599, 605–06 (Tex.App.—Amarillo 2001, no pet.). Qatar cites *May* in error in support of its position; but *May* rightly held that governmental employees were entitled to summary judgment in their official capacities, based on their assertion of sovereign immunity, even though the state agency for whom they were employed was not a party to the suit. *Id.* at 605-606. In *May*, the court agreed that the government need not be named in the suit for the individual employee to rightfully raise immunity.

3) In ***Nueces County v. Ferguson***, the Corpus Christi-Edinburg Court of Appeals likewise expressly took issue with *Davis* and agreed with the *May* opinion holding that whether the governmental unit is named as a party does not affect the ability of an employee of that unit to rely on the defense of sovereign immunity to preclude claims against the defendant-employee sued in an official capacity. 97 S.W.3d 205, n. 11 (Tex.App.—Corpus Christi-Edinburg [13th Dist.] 2002, no pet.); *accord Thomas v. Collins*, 853 S.W.2d 53, 55 (Tex.App.—Corpus Christi 1993, writ denied).

4) In ***Alcorn v. Vaksman***, Houston's First Court of Appeals held that state employees were entitled to sovereign immunity when sued in official capacities for acts performed within the scope of their authority, even though the state was not named as a defendant. 877 S.W.2d 390, 403 (Tex.App.—Houston [1st Dist.] 1994, writ denied) (en banc).

The *Davis* opinion is unpersuasive and has been shown by other appellate courts not to correctly expound Texas law.

Additionally, the multiple opinions Qatar cites purporting to support their proposition that only state entities may raise immunity do not hold that

only governmental entities may raise immunity. Reply, at 2-3. They simply note that the "state" or a "governmental unit" may assert immunity but do not hold that a non-governmental unit cannot. *See Tex. A&M Sys. v. Koseoglu*, 233 S.W.3d 835, 846 (Tex. 2007); *Tex. Nat. Resource Conservation Com'n v. IT-Davy*, 74 S.W.3d 849 (Tex. 2002); *McCartney v. May*, 50 S.W.3d 599, 605-606 (Tex.App.—Amarillo 2001, no pet.). Reply, at 2-3.

The other two cases Qatar cites for its assertion simply affirm the proposition that defendants cannot rely on defenses that protect others to thwart their own personal liability. *See Cantu Services, Inc. v. United Freedom Associates, Inc.*, 329 S.W.3d 58 (Tex.App.—El Paso 2010, no pet.) (holding that a defendant cannot urge another party's defense) citing *City of Alton v. Sharyland Water Supply Corp.,* 145 S.W.3d 673, 682 (Tex.App.—Corpus Christi 2004, no pet.) (holding third-party independent contractors were not entitled to assert defendant's governmental-immunity as a defense to their liability). *Sharyland Water Supply* does not hold that non-governmental entities cannot raise immunity that defeats a court's subject-matter jurisdiction. The court merely holds that two companies that were engaged as contractors for the City of Alton do not "share similar immunity" as the City; and they cannot "assert Alton's sovereign immunity as their own

defense." *Id.*, at 681, 682. The governmental immunity for municipalities issue in *Sharyland Water Supply* is distinct from and inapplicable to the issue here. Zachor's action in the instant case was to preclude the trial court from proceeding with the litigation when it had no subject-matter jurisdiction to do so; not to assert another defendant's defense to thwart potential liability.

The Supreme Court's consistent affirmation that each court must affirmatively determine it has the power to adjudicate each case rebuts Qatar's contention that only a governmental entity may raise immunity. Courts must determine at their "earliest opportunity" whether they have the constitutional or statutory authority to decide a dispute before allowing the case to proceed. *Texas Dept. of Parks & Wildlife v. Miranda,* 133 S.W.3d 217, 226 (Tex. 2004). Qatar's position is that when a governmental unit does not recognize or raise immunity in a court of law, then the other parties who recognize the defect in the proceedings cannot stand up in the courtroom and respectfully advise the court that it lacks jurisdiction to adjudicate the dispute. That is at odds with the duty of candor of officers of the court to advise the court of authority that directly addresses the issue under consideration. Moreover, the irony, the tremendous waste, and the judicial inefficiency are palpable.

If Qatar's position is the rule, trial courts will proceed to adjudicate matters they should not. And when they decide matters in dispute without the power to do so, they will have rendered only void orders, thus distorting litigation between the parties, and wasting valuable public and private resources. *See In re United Servs. Auto Ass'n,* 307 S.W.3d 299, 309 (Tex. 2010) ("A judgment is void if rendered by a court without subject matter jurisdiction."). Neither the law nor common sense support Qatar's rule. In fact, no opinion Qatar cites expressly holds that a non-governmental party to the suit cannot raise with the court an absence of subject-matter jurisdiction based on sovereign immunity.

The trial court here recognized the absence of jurisdiction over Qatar's lawsuit and properly dismissed the lawsuit, either on its own or as prompted by motion, because the court "determined it does not have jurisdiction over Qatar's claims." CR, at 471.

C. The Texas Public Information Act authorized Zachor to intervene in the lawsuit to protect its entitlement to public information.

The PIA entitles Zachor as the requestor to intervene in the lawsuit Qatar pursued to avoid providing public information as required. PIA § 552.325(b). Qatar's contention seeks to preclude Zachor from defending its right to public information through its challenge to the jurisdictional basis of

Qatar's lawsuit. Zachor's plea to the jurisdiction was not intended and, indeed did not and could not in this case, defend Zachor against liability or damages, because there were no liability issues against Zachor. The plea was a valid recognition of the trial court's lack of authority to adjudicate the dispute, but not a defense seeking personal protection as in *Sharyland Water Supply Corp*. discussed above.

PRAYER

For these reasons, Appellee Zachor Legal Institute prays that the Court affirm the trial court's dismissal of the lawsuit and award such further relief, at law or in equity, to which it justly may be entitled.

Respectfully submitted,

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This brief complies with the length limitations of TEX. R. APP. P. 9.4(i)(3) because this brief consists of 2,003 words as determined by Microsoft Word Count, excluding the parts of the brief exempted by TEX. R. APP. P. 9.4(i)(1).

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